

# **DECISION MEMO**

## **Keystone Ski Resort Peru Express Chairlift Upgrade**

### **USDA Forest Service White River National Forest, Dillon Ranger District Summit County, Colorado**

**March, 6th 2020**

#### **BACKGROUND**

Keystone Ski Resort (Keystone) has proposed to replace the Peru Express Chairlift and remove the Argentine Chairlift within Keystone's special use permit (SUP) area. The 2009 Keystone Master Development Plan (MDP) identifies Argentine as the Mountain House base area chairlift to receive upgraded capacity rather than Peru Express. However, Argentine is outdated and rarely open to the public. Upgrading the Peru Express and removing Argentine will provide a modest increase in uphill capacity out of the Mountain House base area that is still well within the comfortable carrying capacity described in the MDP. The attached Approved Project Figure depicts the location of this project. For more information, visit the project website at: <https://www.fs.usda.gov/project/?project=57614>.

#### **DECISION**

Based on project scoping and the analysis conducted, it is my decision to authorize the decommissioning and removal of the Argentine chairlift and the replacement of the existing Peru Express quad with a new detachable 6-person chair. The Peru Express Lift serves as the primary out-of-base lift at the Mountain House base area and consistently experiences some of the longest average wait times of any detachable quad in Colorado. Due to the lift's utilization during night skiing over many years, the machine has accumulated over 47,000 hours of run time (the equivalent to approximately 45 years of service). Replacing the Peru Express Lift with a detachable 6-person chair would increase capacity, improve line wait times, and provide the necessary level of reliability to this out-of-base lift.

My decision includes several project-specific design criteria (PDC) to minimize resource impacts (refer to Table 1). The project area has been reviewed by Forest Service specialists for impacts to relevant resources, including cultural resources, botany, wildlife, soils and wetlands; no significant impacts were identified. The analysis for this project is documented in a project file maintained by the Dillon Ranger District. The project is consistent with management direction provided by the WRNF Land and

Resource Management Plan 2002 Revision (Forest Plan), as well as the specific standards and guidelines established for Management Area 8.25 – Ski Areas.

#### Peru Express Lift and Argentine Lift

To maintain the out-of-base capacity, as well as provide the necessary level of reliability, the proposed action includes decommissioning and removing the existing 6,110-foot-long Peru Express quad and installing a new detachable 6-person chair within approximately the same existing lift corridor. The existing Peru Express Lift corridor is approximately 35–40 feet wide and would be widened to approximately 60 feet to accommodate the proposed 6-person chairlift. Keystone would trim, remove, or masticate trees on an as-needed basis to expand the existing lift corridor to accommodate the proposed 6-person chairlift as shown in the attached Approved Project Figure.

The Peru Express and Argentine lifts combine for an existing hourly out-of-base capacity of approximately 3,890 guests per hour at the Mountain House Base area. A 19 percent increase to 4,600 people per hour out of the Mountain House base area was planned in the MDP. As described above, the proposed upgrade to the Peru Express Lift would take the place of the Argentine Lift upgrade described in the MDP. The proposed removal of the Argentine lift would reduce capacity out of the Mountain House Base by 1,080 guests per hour. The proposed detachable 6-person chair upgrade would increase uphill capacity of Peru Express from 2,400 guests per hour to 3,000 guests per hour.

Excavation and grading would occur for both the top and bottom terminals of the Peru Express lift to accommodate new lift terminal foundations and lift loading/unloading areas. Tree removal and grading would also occur at the top terminal area of the Peru Express lift to improve skier circulation in the unload area, and at the top of the adjacent A-51 terrain park and lift. Standard tree removal equipment would be utilized to remove trees at the top terminal of the Peru Express lift. Felled trees would then be removed or masticated. The top terminal grip bay/maintenance building and combined lift attendant building would be retrofitted to accommodate 6-person chairs by widening the garage doors and adapting the maintenance rail system to connect to the new lift terminal. Construction and maintenance access for the top terminal of the Peru Express would be provided by existing access roads; access to tower foundations would be provided by existing access roads within the alignment and adjacent ski trails. Existing tower foundations will be used to the extent practicable; new foundation locations will be sited to avoid sensitive areas such as wetlands. Staging and laydown areas for lift construction would occur in pre-disturbed locations.

Construction access to remove the top terminal of the Argentine lift would be provided by existing access roads. A helicopter will be used to remove existing towers for both the Peru Express and Argentine lifts and to install new towers for Peru Express. At

locations along the Peru Express lift corridor requiring new tower foundations, Keystone would utilize existing roads and the existing chairlift corridor for heavy equipment access. Access routes would be identified for each foundation location in the construction implementation plan. A track hoe would be utilized for excavating foundations along the alignment; a spider how may be needed to excavate two to three tower foundations on steep terrain. During installation of new towers, crews on the ground will travel by foot from existing roads to tower locations along the Peru Express and Argentine lift corridors. The existing terminals and tower foundations would be removed through the controlled use of explosives to the extent that disturbed areas could be covered with soil to be flush with existing terrain and revegetated. The upper Argentine lift terminal and storage building footprints would be backfilled and graded to match the original contours of the land. The bottom terminals of both lifts are located on private land.

Total disturbance associated with the Peru Express upgrade and Argentine lift removal would be approximately 2.6 acres.

#### Project Design Criteria

To minimize resource impacts, in addition to the applicable WRNF Ski Area General Design Criteria (GDC) posted on the project website, my decision incorporates the following PDC:

**Table 1. Project Specific Design Criteria**

Resource	Design Criteria
<b>General</b>	<p>Prior to construction activities on NFS lands, Keystone will organize the details of the proposed projects into a Construction Implementation Plan for Forest Service review and authorization. This plan will include the following sections:</p> <ol style="list-style-type: none"> <li>1. Construction Management <ul style="list-style-type: none"> <li>• Project schedules, personnel contacts, grading and site plans, staging and parking areas, construction access, timber removal routes and deck locations, and any required survey information.</li> </ul> </li> <li>2. Erosion Control Management <ul style="list-style-type: none"> <li>• Erosion control and drainage plan to contain sediment onsite during construction.</li> </ul> </li> <li>3. Post-Construction Revegetation and Rehabilitation <ul style="list-style-type: none"> <li>• Revegetation plans including methodology, seed mixes, and soil amendments.</li> </ul> </li> <li>4. Noxious Weed Monitoring and Treatment <ul style="list-style-type: none"> <li>• Weed control plans including equipment cleaning, pretreatment, and post-construction monitoring and treatment.</li> </ul> </li> </ol>

	<ul style="list-style-type: none"> <li>• Perform noxious weed treatment in areas of known noxious weeds identified in the botany report.</li> </ul> <p>5. Best Management Practices (BMPs)</p> <ul style="list-style-type: none"> <li>• Approved construction limits of disturbance at the top and bottom terminals will be flagged and fenced-off prior to construction.</li> <li>•</li> </ul>
<b>Vegetation</b>	<p>In areas of disturbance where surveys have not previously occurred (top terminal vicinity of Peru Lift), conduct surveys for wetlands, soil, and Region 2 Sensitive Plant Species prior to implementation. If any species are discovered, an agency-authorized botanist shall prepare mitigation measures to avoid or minimize impacts as appropriate.</p> <p>Trees proposed for removal must be designated or approved by the Forest Service prior to cutting.</p>
<b>Scenery</b>	<p>All structures proposed on NFS lands shall be reviewed and authorized in accordance with the WRNF Facility Design Review Guide (2017).</p>
<b>Wetlands</b>	<p>Avoid all direct wetland impacts through placement of lift towers and construction equipment access along Peru Lift corridor. Access routes for Argentine Lift tower removal limited to helicopter and foot-access.</p>
<b>Wildlife Resources</b>	<p>If tree cutting activities are proposed between May 1 and July 15, surveys for active migratory bird nests should be conducted by a qualified biologist prior to tree cutting. Where possible, trees with cavities should be retained for future nesting sites.</p>

## CATEGORICAL EXCLUSION

Decisions may be categorically excluded from documentation in an environmental impact statement (EIS) or environmental assessment (EA) when they are within one of the categories identified by the USDA in 7 CFR § 1b.3 or the proposed action is within a category listed in 36 CFR §§ 220.6(d) and (e), and there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative environmental effect. I have determined that the project, as proposed by Keystone and described in detail above, is consistent with the category 36 CFR § 220.6(e)(3), *“Approval, modification or continuation of minor special uses of National Forest System lands that require less than five contiguous acres of land.”*

I find no extraordinary circumstances related to this decision that may result in a

significant individual or cumulative environmental effect. Prior to implementation, Forest Service resource specialists will further review the approved project for field fitting, as necessary. Therefore, I have decided to authorize the project, as described above, without further analysis and documentation under the NEPA. The following resource conditions were considered in determining whether extraordinary circumstances related to the project I am authorizing warranted further analysis and documentation in an EIS or an EA (36 CFR § 220.6(b)(i-vii)).

#### Federally-Listed Threatened or Endangered Species or Designated Critical Habitat, Species Proposed for Federal Listing or Proposed Critical Habitat, or Forest Service Sensitive Species

The Endangered Species Act requires that federal actions not jeopardize the continued existence of any species federally listed or proposed as threatened or endangered or result in adverse modification to such species' designated critical habitat. The project area contains potentially suitable habitat for Canada lynx (*Lynx canadensis*), Mexican spotted owl (*Strix occidentalis lucida*), greenback cutthroat trout, and Ute Ladies'-tresses orchid (*Spiranthes diluvialis*). The project area is outside of designated final critical habitat for Mexican spotted owl. There is no designated critical habitat for Ute Ladies'-tresses orchid or greenback cutthroat trout. Previous surveys within Keystone SUP Area have detected only brook trout. The proposed project would have no impact on these species.

Federally listed species with potential to be present or affected by the approved projects include the Canada lynx. Although areas of tree removal and tree trimming for the widened Peru Express lift corridor and grading and excavating at the top terminal will overlap small areas of primary (0.4 acres) and secondary (0.6 acres) lynx vegetation, these forested blocks are all less than 50 acres, are not immediately adjacent or within a lynx linkage area, and are already highly dissected and developed. As is specified in the Inter-Agency Southern Rockies Lynx Project Decision Screens, screen 2 (2014) these project related impacts would result in a determination of "Not likely to Adversely Affect" the Canada lynx (ICF 2020).

This project also considered Forest Service Region 2 Sensitive species. The project area contains suitable habitat for the following animal species: northern goshawk (*Accipiter gentilis*), boreal owl (*Aegolius funereus*), olive-sided flycatcher (*Contopus cooperi*), American marten (*Martes americana*), spotted bat (*Euderma maculatum*), hoary bat (*Lasiurus cinereus*), fringed myotis (*Myotis thysanodes*), Townsend's big-eared bat (*Corynorhinus townsendii*), and pygmy shrew (*Sorex hoyi*). The project area is suspected to have suitable habitat for monarch butterfly (*Danaus plexippus plexippus*) and western bumble bee (*Bombus occidentalis*) as well; however, this is unconfirmed. Of these species, only hoary bat, olive-sided flycatcher, and pygmy shrew would potentially be adversely affected due to the removal of suitable roosting, nesting, and other habitats and could result in the injury or mortality of individuals during tree removal

activities. These species occur throughout Colorado or the Rocky Mountains and while the project may adversely affect individuals of these species during construction, it is not likely to result in a lack of viability in the Planning Area, nor cause a trend towards Federal listing or a loss of the species rangewide (ICF 2020). For the remainder of Region 2 Sensitive species, the proposed projects would have no impact.

Forest Service Region 2 Sensitive Plant Species were also considered, and no Forest Service Sensitive Plant species were documented during onsite field reconnaissance conducted on September 6, 2018. It was determined that the project area contains suitable habitat for the following plant species which are species of local concern: echo moonwort (*Botrychium echo*) and red-stem triangle moonwort (*Botrychium lanceolatum* subsp. *lanceolatum*). Additionally, project areas in the vicinity of the top terminal will be surveyed for Region 2 Sensitive Plant Species prior to construction and avoided if found.

#### Floodplains, Wetlands, or Municipal Watersheds

Impacts to the wetlands and other waters of the U.S. for the approved project are expected to be negligible. The approved project was designed to avoid impacts to wetlands. There are no anticipated direct effects to wetlands within the Peru Express chairlift corridor and lift towers will be located in upland areas. Wetlands in the vicinity of ground disturbing activities within the Peru Express Chairlift corridor and bottom terminal have been delineated and will be fenced off with temporary construction fence and/or sediment fence prior to construction. Additionally, the grading and tree removal areas in the vicinity of the top terminal will be surveyed for wetlands and other waters of the U.S. prior to construction and avoided if found.

No floodplains or municipal watersheds will be affected by this Decision (FEMA 2020).

#### Congressionally Designated Areas

No actions will occur within in any Congressionally designated wilderness area, wilderness study areas, or National Recreation Areas.

#### Inventoried Roadless Areas

No actions will occur within an Inventoried Roadless Area.

#### Research Natural Areas

No actions will occur in Research Natural Areas.

#### American Indians Religious or Cultural Sites, Archaeological Sites, or Historic Properties

Section 106 of the National Historic Preservation Act (U.S.C. 470 et seq.) requires Federal agencies take into account the effect of a project on any pre-contact or historic district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places (NRHP). In support of Section 106 commitments, a

Class I records search was performed for the project that included a 1-mile buffer of the area of potential effect (APE) in February 2020. The results of the records search indicate that 22 cultural resources surveys have been performed and 14 cultural resources sites were identified within a 1-mile buffer of the APE. Of the previous surveys, the APE has been covered entirely by a combination of four separate cultural inventories and, following consultation with the Heritage Program of the WRNF, it was determined that a re-survey of the project area was not necessary and that the results of the records search would be detailed in a Class I technical letter report for the project (Gustafson 2004; Kainer and Love-dePeyer, 1982; Metcalf 2012; Uphus 2012).

If as-yet unrecorded historic and/or prehistoric properties are located during project ground disturbing activities or planning activities associated with approved construction activities, all construction in the immediate vicinity shall cease and be treated as specified in 36 Code of Federal Regulations (CFR) §800.11. If cultural resources are discovered in the project area, additional measures will be employed such that the resources are not impacted.

## **PUBLIC INVOLVEMENT**

A scoping notice dated February 5, 2020, was sent to 68 members of the public, including organizations and agencies, and was also published on the project website (<https://www.fs.usda.gov/project/?project=57614>) with the intent of providing information on the proposal. Six comments were received from members of the public in response to the scoping notice. Two comments were in support of the proposed project; four comments were opposed or offered variations to the proposed project.. One commenter expressed concern that the proposed project would contribute to crowding and slope safety issues on the Schoolmarm trail. However, the proposed Peru Express Chairlift Upgrade would result in only a modest increase in uphill capacity out of the Mountain House base area that is within the comfortable carrying capacity described in Keystone's MDP. Additionally, Peru Express is also utilized by guests to access expert terrain near the western limits of Keystone's SUP boundary, the A51 Terrain Park, and Packsaddle Bowl. No changes to the proposal were made based on public comments.

## **FINDINGS REQUIRED BY OTHER LAWS**

This decision is consistent with the Forest Plan as required by the National Forest Management Act. The project was designed in conformance with appropriate Forest Plan standards and guidelines for Management Area 8.25 – Ski Areas.

## IMPLEMENTATION AND ADMINISTRATIVE APPEAL

This decision is not subject to appeal or objection. Implementation may occur immediately in accordance with the GDC and PDC referenced above.

## CONTACT PERSON

For additional information concerning this decision, contact Marcus Dreux, White River National Forest, Dillon Ranger District Mountain Sports Ranger by telephone at (970) 262-3443 or by email at [marcus.dreux@usda.gov](mailto:marcus.dreux@usda.gov).



 SCOTT G. FITZWILLIAMS  
Forest Supervisor

3/4/20  
Date



## REFERENCES

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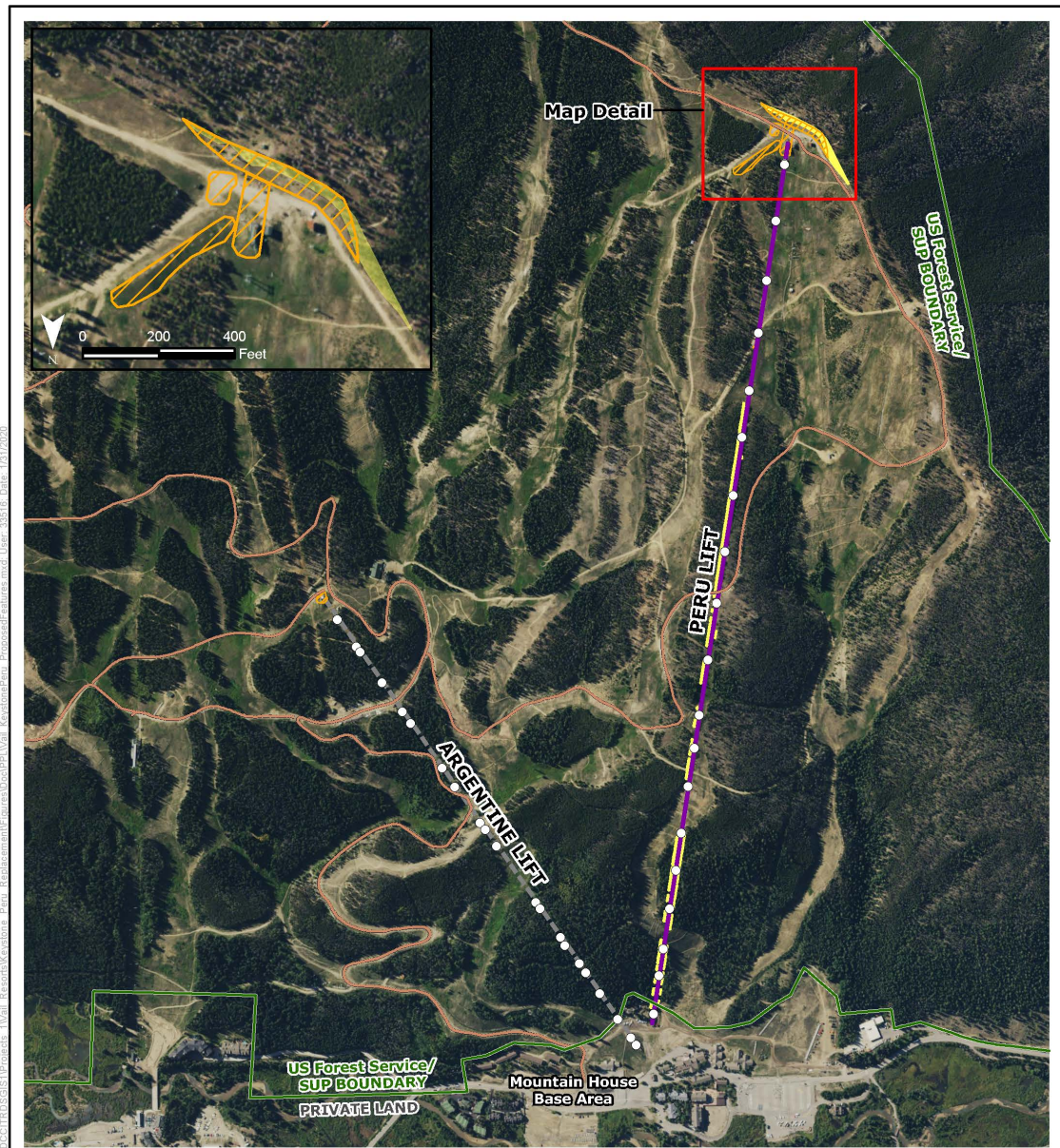
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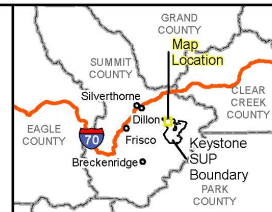
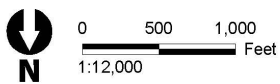
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- | Proposed Action        | Existing Features                 |
|------------------------|-----------------------------------|
| Grading - Top Terminal | Special Use Permit (SUP) Boundary |
| Tree Removal Area      | Roads                             |
| Lift Replacement       | Lift Tower                        |
| Lift Removal           |                                   |



**Approved Project Figure**  
**Keystone Peru Lift Replacement**  
**Vail Resorts**